

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**IN RE: COMMUNITY HEALTH  
SYSTEMS, INC.,  
CUSTOMER SECURITY DATA  
BREACH LITIGATION  
(MDL 2595)**

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**MASTER FILE NO.  
15-CV-222-KOB**

This document relates to all cases.

**CO-LEAD COUNSEL’S MOTION FOR LEAVE  
TO FILE DOCUMENTS UNDER SEAL**

Co-lead counsel for the Plaintiffs respectfully request the Court enter an Order allowing documents to be filed under seal pursuant to the Protective Order agreed to by the parties and entered by this Court (Doc. 42), and as grounds therefore, say as follows:

1. In Plaintiffs’ Response in Opposition to the Motion to Dismiss filed by Community Health Systems, Inc. (“CHSI”), the Plaintiffs rely on documents produced by CHSI in response to the Plaintiffs’ Interrogatories and Request for Production. These documents are identified as Exhibit “A” to Plaintiffs’ Response in Opposition to CHS, Inc.’s Motion to Dismiss.

2. Pursuant to the Protective Order entered by the Court (Doc. 42), CHSI has designated these documents as Confidential. Accordingly, they are due to be filed under seal.

3. Contemporaneous with the filing of this Motion, a sealed envelope containing a paper copy of the documents to be submitted under seal as Exhibit “A” and a PDF copy of the those same documents on a disk has been provided to the Clerk. A courtesy copy of this

Motion, along with a second envelope containing the documents to be filed under seal both in paper and PDF format for Judge Bowdre's has been left at the Clerk's office.

Co-Lead counsel respectfully request that the Court grant this Motion and allow the documents provided to both the Clerk and the Court to be filed under seal as Exhibit "A" to the Plaintiff's Opposition to Community Health Service, Inc.'s Motion to Dismiss.

Dated: October 27, 2015

By: /s/ Jeffrey E. Friedman

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**Plaintiffs' Liaison Counsel**

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel of record on this 27th day of October, 2015.

/s/ Jeffrey E. Friedman  
OF COUNSEL